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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL THEIR
RESPONSE TO SPECIAL MASTER'S
RECOMMENDATION**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness,
4 I could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Defendants' Administrative Motion to File Under Seal Their Discovery Letter Brief
6 ("Letter").

7 2. Defendants file under seal the below documents in accordance with Paragraph
8 14.4 of the Protective Order, but do not believe any of these documents contain sealable
9 information:

Document	Portions to Be Filed Under Seal	Designating Party
Response to Special Master's Recommendation ("Response")	Highlighted Portions	Plaintiff (Green)
Chang Decl. Ex. A	Entirety	Collier Law Firm
Chang Decl. Ex. B	Entirety	Richard Jacobs
Chang Decl. Ex. C	Entirety	Plaintiff
Chang Decl. Ex. D	Entirety	Plaintiff

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19 3. Defendants do not believe the green-highlighted portions of the Response or
20 Exhibits C or D to the Declaration of Esther Chang ("Chang Declaration") merit sealing, but
21 Waymo designated this material "Highly Confidential – Attorneys' Eyes Only." Defendants file
22 this material under seal in order to provide Waymo the opportunity to justify sealing pursuant to
23 Local Rule 79-5.

24 4. Defendants file Exhibits A and B to the Chang Declaration under seal in order to
25 provide Collier Law Firm and Richard Jacobs the opportunity to justify their respective
26 "Confidential" designations for these documents.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this
2 22nd day of December, 2017 at Washington, District of Columbia

3
4 /s/ Michelle Yang

Michelle Yang

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Michelle Yang has concurred in this filing.

Dated: December 22, 2017

/s/ Arturo J. Gonzalez

ARTURO J. GONZALEZ